

To: Burns, Francis[Burns.Fran@epa.gov]; Kelly, Jack (R3 Phila.)(Kelly.Jack@epa.gov]
Cc: Markiewicz, Karl[Markiewicz.Karl@epa.gov]; Helverson, Robert[Helverson.Robert@epa.gov]
From: Werner, Lora
Sent: Thur 2/6/2014 1:22:00 PM
Subject: Fw: MCHM 101 predictions: request to EPA re fate and transport questions for WV health

Hi Fran and Jack

Could you share this with your WV Env Unit group? Would EPA be willing to share some thoughts on the questions raised in the email forwarded below with Dr. Tierney and Walt Ivey?

Maybe we could discuss at 9 am.

Thanks, Lora

From: Tierney, Letitia <Letitia.Tierney@wv.gov>
Sent: Wednesday, February 05, 2014 9:25:55 PM
To: 'Werner.Lora@epa.gov'; 'Helverson.Robert@epa.gov'; 'rmi0@cdc.gov'; 'txp1@cdc.gov'
Subject: FW: MCHM 101 predictions

Hello gang:

Here is another one that I will need help with crafting a response. Thank you.

Letitia Tierney, MD JD

Commissioner Bureau of Public Health

State Health Officer

West Virginia Department of Health and Human Resources

350 Capitol Street, Room 702

Charleston, WV 25301

304-558-2971

Letitia.Tierney@WV.gov

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From: Ivey, Walter M
Sent: Wednesday, February 05, 2014 7:37 PM
To: Tierney, Letitia
Cc: Taylor, Barb S; Douglas, J D
Subject: FW: MCHM 101 predictions

Dr. Tierney, An email that was forwarded to me from Randy Huffman. Any suggestion on how to handle this email? Should it be forwarded to a chemist to see if they have a response? Thanks.

Walt

From: Huffman, Randy C
Sent: Wednesday, February 05, 2014 4:49 PM
To: [Ex. 6 - Personal Privacy]
Cc: Ivey, Walter M
Subject: RE: MCHM 101 predictions

Mr. [] Thank you for this information. Your input is very much appreciated. In order for this type of information to be properly evaluated, it is necessary that it reach the appropriate officials. To that end, I am forwarding this to the Bureau of Public Health which is the appropriate governmental authority on the issues you raise.

Randy

From: [Ex. 6 - Personal Privacy] [mailto:] [Ex. 6 - Personal Privacy]
Sent: Tuesday, February 04, 2014 6:54 PM
To: Tomblin, Earl Ray; Huffman, Randy C; echilton@wagazette.com
Cc: Ron & Sue McClure Ney
Subject: MCHM 101 predictions

To: Earl Ray Tomblin, Governor of West Virginia, Governor
earl.ray.tomblin@wv.gov

To: Randy C. Huffman, Cabinet Secretary, Department of Environmental
Protection, randy.c.huffman@wv.gov

Cc: Elizabeth Hilton, echilton@wagazette.com

From: Ronald E. Ney, Jr., PHD

Subject: MCHM 101 degradation prediction

Dear Governor Tomblin and others

I cannot understand why some chemist from West Virginia University or some other university has not informed you on the following.

There are registered pesticides with similar formulas such as cyclohexane, cyclohexanol, cyclohexanone and etc.

MCHM is a cyclohexane. Cyclohexane can degrade to cyclohexanol a pesticide and to nitrophenol (p-nitrophenol is a pesticide) and to nitrosamines which are carcinogens. A pesticide chemist who has reviewed pesticide data on fate in transport of pesticides in air, water, soil, plants and animals should be able to

predict this.

Since there is little if any data on the degradation of MCHM in air, water, soil, plants and animals one can use predictive methods knowing that such methods can have a large percent error. However they are helpful. The USEPA should have residue data on the pesticide to help draw some conclusions. There is a Jujitsu CAChe model that can predict toxicity and etc. If the physical chemical properties are known such as Koc, Kow, WS and OW they can be used to predict fate in the environment. A prediction of what can happen is better than no to little data.

I would never drink the water until I knew if the following was discerned in the drinking water and in the river.

- Are nitrosamines which are carcinogens present?
- Are radioactive chemicals present?
- What residues (parent and degradates) were they looking for?

ü I would also like to have seen the residue data (residue meaning parent and degradates), the extraction method(s) and determinative method(s) used to discern the presence or absence.


ü Do they even know what degradates to look for?

My only request is to let the people know about this and to protect them especially vulnerable children, pregnant women, nursing mothers, persons with immune disorders, elderly and wounded veterans.

Respectfully submitted,

Ronald E. Ney, Jr., Ph.D., Advocate for Valid Science

- Retired FDA, USDA and USEPA FIFRA Pesticide Chemist and Science Advisor for RCRA regulations, Lecturer, Author of Fate and Transport of Organic Chemicals in the Environment, third edition, Chemicals:What you need to know and Where did that chemical go?.

 USEPA Office of Solid Waste and Emergency Response Environmental Remediation Technologies Student Manual (5201G) December 2011 refers to the book by Ronald E. Ney, Jr., Ph.D. Where Did That Chemical Go? for site clean-up.

- Chief of Environmental Chemistry, USEPA; for Fate and Transport of Pesticides in Air, Water, Soil, Plants and Animals, and Modeling. I wrote the data requirements for 40CFR § 158.290 and § 158.1300 Subpart N.

- Former Real Estate Broker, Certified Real Estate Appraiser, Adjunct Assistant Professor for General Chemistry, Real Estate Appraisal and other environmental courses.

- Formally registered as an Environmental Professional with the State of California.

- Expert witness for DOJ, USEPA and law firms for pesticide and hazardous waste cases, CERCLA sites and is a federally protected witness.

Ø Certificate of Achievement and entered into the 16th edition of AMERICAN MEN AND WOMEN OF SCIENCE, January 1987.

Ø In 1994-1995, included in Marquis WHO'S WHO IN SCIENCE AND ENGINEERING, Marquis WHO'S WHO in America.

Ø In 1997, included in the International Who's Who in Cambridge, England.